Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109

REPLY COMMENTS OF CINTEX WIRELESS

Cintex Wireless, LLC ("Cintex") hereby respectfully submits its reply comments in the above captioned Notice of Proposed Rulemaking ("NPRM"). These reply comments address (1) the eligibility requirements for consumers participating in the pilot program, (2) whether participants should be permitted to test multiple design elements; and (3) whether the Commission should continue Link Up support.

I. Expand Eligibility for the Pilot Program

The Commission's Public Notice sought "additional focused comment specifically on whether to maintain the current eligibility requirements for consumers participating in the pilot program . . ."[1] No parties suggested stricter eligibility requirements, and a number supported more inclusive requirements.

Cintex urges the Commission to adopt separate eligibility requirements for the blind and visually impaired. This segment of our population has unique challenges and needs and can

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[1] Further Inquiry into Four issues in the Universal Service Lifeline/Link Up Reform and Modernization proceeding, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (rel. August 5, 2011) at 2.

benefit tremendously from broadband, especially mobile broadband. In addition to the benefits enjoyed by the general population, broadband brings unique benefits to the blind and visually impaired. For example, an Android application called WalkyTalky speaks the addresses of nearby locations as you pass them. And GoogleMaps provides step-by-step walking directions that are spoken as the person walks. Applications like these can be literally life altering for someone who is blind. In addition, as discussed below, a very large percentage of persons with low vision do not participate in the work force. Thus, the Internet can play an especially important role in helping the visually impaired find employment.

But while the blind can perhaps benefit more from broadband than any other segment of our population, they clearly also face some of the greatest adoption challenges. Many devices are not suitable for use by the blind and visually impaired, and those that are suitable are more expensive. The blind and visually impaired have lower average incomes than the general population, making the cost of the devices and the service a significant barrier to adoption.

Data gathered in the Current Population Survey by the U.S. Department of Labor's Bureau of Labor Statistics shows that in September of 2010, only 37.7 percent of working age adults (ages 16 to 64) who reported vision loss[2] were employed.[3] That means that of the 2.1 million working age adults who reported serious vision loss, only 795,000 had work. Further, the visually impaired tend to earn substantially less than those without any disability. The U.S. Census Bureau reported that in 2002, the mean earnings of those without disability was $32,870,

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[2] For purposes of the survey, vision loss was defined as "anyone blind" or anyone with "serious difficulty seeing even when wearing glasses."

[3] September 2010 Current Population Survey, U.S. Department of Labor, Bureau of Labor Statistics.

while the mean earnings of persons reporting severe "difficulty seeing words/letters" was $22,189.[4]

The data paints a bleak picture. The visually impaired are significantly under employed, and those that do work, earn substantially less than others. Compounding this problem is that this population segment has higher average living expenses than others since they need to purchase unique products and services to help them function effectively and efficiently. While some state governments have programs to help the visually impaired with these expenses, the programs generally do not make them whole. For example, the Maryland Technology Assistance Program offers disabled residents of Maryland loans to buy assistive technology.[5] While interest rates are below market, they are not zero, and participants must still pay back the principal. Accordingly, the visually impaired are disadvantaged in two key respects: (1) they have significantly lower incomes, and (2) higher living expenses. For these reasons, Cintex urges the Commission to approve a pilot specifically designed to address broadband adoption by the blind and visually impaired, and suggests that *any person* who is blind or visually impaired be eligible to participate in the pilot.

II. Individual Participants Should be Permitted to Test Multiple Design Elements

Certain segments of the population, such as the blind, are likely to have completely different reactions to the elements of a broadband offering. For example, equipment that may be very popular with the general population may be useless for the blind; training that may be sufficient for the general population may not be sufficient for the blind; and discounts that may

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[4] Americans with Disabilities: 2002, U.S. Department of Commerce, U.S. Census Bureau, Table 5 (issued May 2006).

[5] See, http://www.mdod.state.md.us/MTAP.aspx?id=180&ekmensel=c580fa7b_112_0_180_3

encourage high adoption rates among low-income consumers in the population at large, may not do so for the blind and visually impaired. Accordingly, Cintex encourages the Commission to allow participants in the pilot program to test multiple design elements, at least as it relates to the blind and visually impaired.

III. Including a Pilot for the Blind and Visually Impaired Furthers Objectives of the National Broadband Plan

The National Broadband Plan recommended that the Commission "issue a Notice of proposed Rulemaking on whether to establish separate subsidy programs to fund broadband services and assistive technologies under the Telecommunications Relay Services (TRS) program."[6] Further it suggested that Universal Service Funds be used "to provide assistive technologies to individuals who are deaf or blind to access broadband services."[7]

The Commission can encourage broadband adoption by the blind and visually impaired through the low-income program. Any broadband pilot program that does not include the blind and visually impaired would be leaving out a low-income segment of the population that has more to gain from broadband than perhaps any other.

IV. The Commission Should Continue Link Up Support

Nexus Communications, Inc. ("Nexus") is correct that Link Up support is critical to grass roots marketing efforts that target low income consumers.[8] Cintex has been designated an eligible telecommunications carrier by five state commissions; the company markets directly to consumers by sending out teams of people to low income neighborhoods. This labor intensive, in-person advertising, would not be possible absent Link-Up support. Lifeline support alone

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6 National Broadband Plan, Recommendation 9.10.

7 Id.

8 See, Nexus Comments at 7 to 10.

does not justify the higher acquisition costs associated with in-person marketing. If the Commission eliminates Link-Up support, a significant percentage of the low-income population will not benefit from Lifeline.

Respectfully submitted,

Robert Felgar

Robert Felgar
General Counsel
Cintex Wireless, LLC
11910 Parklawn, Suite U
Rockville, MD 20852
(301) 363-4306

Counsel for Cintex Wireless, LLC

September 2, 2011